

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE: :  
Nora M. O'Malley : Chapter 13  
: No.: 21-11971-AMC  
Debtor(s) :  
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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY Y.A.H., Inc. PROFIT SHARING PLAN

Debtor, Nora M. O'Malley, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Y.A.H., Inc. Profit Sharing Plan hereby submits the following:

1. Admitted.
2. Admitted.
3. Admitted. By way of further answer at all times relevant to the instant bankruptcy only it has been the Debtor's desire to recoup the equity in the property and engage in a traditional sale of the property.
4. Admitted. As of the time of filing this Response, the Movant has not filed a Proof of Claim. However, the subject property is subject to a Listing Agreement with Long and Foster-Media as the seller's realty company. The sales price of the subject property is \$700,000.00. Attached hereto as Exhibit "A" is the August 9, 2021 Listing Agreement which was entered into in good faith to sell the property and payoff the mortgage due to Movant.
5. Denied.
6. Denied.
7. Denied.
8. Denied. Movant's instant filing is a good faith effort to cure the default and satisfy the mortgage due to Movant.
9. Denied.
10. Denied.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Respectfully submitted,

Dated: August 19, 2021

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
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Philadelphia, PA 19107  
(215) 545-0008

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#### CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**William C. Miller, Esq.**  
Chapter 13 Trustee

**Peter E. Meltzer**  
Attorney for Movant  
Electronic Notice to *bankruptcy@wglaw.com*

Dated: August 19, 2021

/s/Brad J. Sadek, Esq.

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